

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT
for the
Southern District of West Virginia



Product Management Services
c/o Kandance Wells

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Verizon Corporation
Google Corporation
Bay Dan Incorporated

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 2:24-cv-00328
(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Kandance Wells</u>
Street Address	<u>1546 Kanawha Blvd E #418</u>
City and County	<u>Charleston Kanawha</u>
State and Zip Code	<u>West Virginia 25311</u>
Telephone Number	<u>(703) 402-2379</u>
E-mail Address	<u>productmgt21@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name Verizon Corporation
 Job or Title (if known) Cellular Corporation
 Street Address One Verizon Way
 City and County Basking Ridge / NA
 State and Zip Code New Jersey 07920
 Telephone Number (908) 559-2001
 E-mail Address (if known) N/A

Defendant No. 2

Name Google Corporation (Google Lens)
 Job or Title (if known) N/A
 Street Address 1600 Amphitheatre Parkway
 City and County Mountain View, NA
 State and Zip Code California 94043
 Telephone Number (650) 253-0000
 E-mail Address (if known) N/A

Defendant No. 3

Name Ray Ban Incorporated
 Job or Title (if known) N/A
 Street Address 12 Harbor Park Drive
 City and County Port Washington, NA
 State and Zip Code New York 11050
 Telephone Number N/A
 E-mail Address (if known) N/A

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐

Federal question

☒

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *Corporate Espionage, Intellectual Property Theft Harassment*

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)**

- a. If the plaintiff is an individual *Product Management Services*
The plaintiff, (name) *Ms Kandance Wells*, is a citizen of the
State of (name) *West Virginia*.
- b. If the plaintiff is a corporation
The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

- a. If the defendant is an individual
The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, ^(name) Verizon, Google, Ray Ban, is incorporated under the laws of the State of ^(name) New Jersey, California, New York and has its principal place of business in the State of ^(name) New Jersey, California, New York.
 Or is incorporated under the laws of ^(foreign nation) _____,
 and has its principal place of business in ^(name) United States.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because ^{(explain):} theft.
The projected number and amount of sales from sale of business research (Intellectual property), Risks of criminal entrapment due to infringement, confiscation of evidence (cellular evidence) of retaliation (medical malpractice)

III. Statement of Claim "Theft of Digi-Frames"

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Plaintiff has been (human) tracked in order to secure investments in intellectual property illegally obtained thru cellular data infringing on plaintiff's business platform. Defendants entrapped Plaintiff in her personal life in order to monetarily capitalize on fraudulent (unlawful) product investments obtained unlawfully causing Plaintiff harm in business sectors & compromising the safety of Plaintiff (& friends/family)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks monetary relief to compensate for business damages and to secure her personal safety following dismissals (which led to claims) in the amount of \$24,000,000.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

7/2/24

Signature of Plaintiff



Printed Name of Plaintiff

Kandance Wells

B. For Attorneys

Date of signing:

7/2/24

Signature of Attorney



Printed Name of Attorney

Kandance Wells (Pro Se)

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

(703) 402-2379

E-mail Address

productmgt@prose21@gmail.com
Productmgt21@gmail.com